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18 **UNITED STATES DISTRICT COURT**  
19 **NORTHERN DISTRICT OF CALIFORNIA**  
20 **SAN FRANCISCO DIVISION**

21 IN RE: UBER TECHNOLOGIES, INC.,  
22 PASSENGER SEXUAL ASSAULT  
LITIGATION

23 This Document Relates to:  
24 ALL ACTIONS  
25

Case No. 3:23-md-03084-CRB

**DECLARATION OF RANDALL S. LUSKEY  
IN SUPPORT OF DEFENDANTS' MOTION  
FOR RELIEF FROM NONDISPOSITIVE  
PRETRIAL ORDER OF MAGISTRATE  
JUDGE**

26 Judge: Hon. Charles R. Breyer  
27 Courtroom: 6 – 17th Floor  
28

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**DECLARATION OF RANDALL S. LUSKEY**

I, Randall S. Luskey, declare pursuant to 28 U.S.C. § 1746:

1. I am over 18 years of age, of sound mind, and competent to make the statements in this declaration. I am an attorney at law duly licensed to practice before all courts of the State of California and a partner at the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, attorneys of record for Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”) in the above-captioned matter. I have personal knowledge of the facts set forth herein, except where stated upon information and belief, and if called as a witness to testify, I could and would competently testify as to the truth of the same if requested to do so.

2. I submit this declaration in support of Uber’s Motion for Relief from the Nondispositive Pretrial Order of Magistrate Judge Cisneros dated March 24, 2025, Dkt. No. 2600.

3. Attached to this declaration as **Exhibit 1** is a true and correct copy of the Declaration of Dara Khosrowshahi submitted in support of Uber’s Memorandum of Points and Authorities in support of its Motion for a Protective Order, dated February 28, 2025, Dkt. 2425.

4. Attached to this declaration as **Exhibit 2** is a true and correct copy of the Declaration of Jill Hazelbaker submitted in support of Uber’s Memorandum of Points and Authorities in support of its Motion for a Protective Order, dated February 28, 2025, Dkt. 2425.

5. Attached to this declaration as **Exhibit 3** is a true and correct copy of the Order on Plaintiffs’ Renewed Request to Depose Sundar Pichai, entered in *Brown v. Google LLC*, No. 20-cv-03664-YGR (SVK), Dkt. No. 758 (N.D. Cal. Sept. 26, 2022).

6. Attached to this declaration as **Exhibit 4** is a true and correct copy of the Order on Uber’s Motion to Quash and for Protective Order, entered in *In re: Uber Rideshare Cases*, No. CJC-21-005188 (Cal. Super. Ct. Jan. 9, 2025).

7. Attached to this declaration as **Exhibit 5** are true and correct excerpts from the certified transcript of the March 26, 2025 deposition of Henry Gustav Fuldner and excerpts from the rough transcript of the March 27, 2025 deposition of Henry Gustav Fuldner coordinated between *In Re: Uber Rideshare Cases*, Case No. CJC-21-005188 (the “JCCP”) and this litigation.

